

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

JAMETRIUS MCCON

PLAINTIFF

VERSUS

CASE 1:17cv77-LG-RHW

ADOLFO PEREZ; D&D EXPRESS TRANSPORT

DEFENDANTS

AND

D&D EXPRESS TRANSPORT CORP

THIRD PARTY

PLAINTIFF VERSUS

DARYL D. WILLIAMS

THIRD PARTY DEFENDANT

**SUPPLEMENTAL RULE 26 INITIAL
DISCLOSURES OF JAMETRIUS
MCCON**

COMES NOW, the Plaintiff, Jametrius McCon, by and through the attorney of record, Edward Rowan, who hereby provides the following Supplemental Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):

PRELIMINARY STATEMENT

Plaintiff provides the following disclosures based upon reasonable inquiry and information available and currently known to them regarding the particular factual allegations of the Complaint. The listing of a name herein does not constitute a concession by Plaintiff that the person or persons in fact has or have relevant or discoverable information. Likewise, the Plaintiff does not concede by listing a particular document or category of documents that all or any documents are relevant to the issues in the case, or that all or any are properly discoverable. The Plaintiff hereby reserve all objections which otherwise would be available to them concerning the production of a requested witness or the scope of inquiry to be had of the witness. In addition, the Plaintiff does not waive, and hereby specifically reserve, all applicable privileges or work product

protections, and reserve the right later to assert any appropriate objections to the production of any disclosed witnesses or documents.

A. Individuals with Discoverable Information

The name, last known address and telephone of individuals known by Plaintiff that are likely to have discoverable information relevant to their claims or defenses:

1. Plaintiff Jametrius McCon
5708 Eastwood Drive, Moss Point, MS 39563

Subjects of discoverable information: the events leading up to and immediately following the wreck, his claims in this lawsuit, and any other matter relevant to this lawsuit.

2. Daryl D. Williams 2313 Prince George Drive,
Gautier, MS 39553 Number unknown

Subjects of discoverable information: the events leading up to and immediately following the wreck, his claims in this lawsuit, and any other matter relevant to this lawsuit.

3. Larry W. Henderson
3414 Shortcut Road, Pascagoula, MS 39581
Number unknown

Subjects of discoverable information: the events leading up to and immediately following the wreck.

4. Lemario S. Henderson
3413 Kimberly Drive, Moss Point, MS 39563
Number unknown

Subjects of discoverable information: the events leading up to and immediately following the wreck.

5. Adolfo Perez
450 NW 61st Avenue, Miami, FL 33126

Subjects of discoverable information: the events leading up to and immediately following the crash, his training and supervision, the regulation and rules he must follow, trucking safety issues, and his failure to maintain a lookout and proper distance.

6. Dave Wilton, Senior Adjuster/Investigator
CJ HESTER INC.
4088 Government Blvd., Mobile, AL 36693
251-342-8400

Subjects of discoverable information: photographs he took of the vehicles involved in the wreck and the wreck scene, timing of counsel's request to inspect Defendant's tractor-trailer to download EDR data, and any other matter relevant to this lawsuit.

7. Trooper Joshua P. LaCap
Address and phone number unknown

Subjects of discoverable information: what Trooper LaCap witnessed/observed the day of the wreck once on scene, the Highway Patrol investigative file, the photographs Trooper LaCap took on the scene, and any other matter concerning the Highway Patrol's investigation.

8. Carlos Laguna
Address and phone number unknown

Subjects of discoverable information: Employee of Defendant D&D Express who was present on the trip which eventually led to the wreck at issue in this case. His knowledge is best known by the Defendant in this case, but includes details of the trip, the hours of service, and his employment with D&D Express.

9. Dr. Chris Wiggins – See expert's disclosure, herein.
10. Dr. Christopher Burge – See expert's disclosure, herein.
11. Paul Dillard – See expert's disclosure, herein.
12. Gary Johnson – See expert's disclosure, herein.
13. John Boyd – supervisor at Ingalls who will testify regarding Plaintiff's physical abilities before and after the wreck, as well as wages earned.
14. Any person deposed in this case.
15. Any person with discoverable information identified by the Defendant or any other party in this case.
16. Any person with the MS Highway Patrol who assisted at the wreck scene and who may have knowledge about the wreck.
17. Any person with EMS or other ambulance service who was at the scene.

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of October 2017, I sent a copy of the foregoing upon all counsel of record via email only:

Larry G. Canada
Kathryn Breard Platt
GALLOWAY, JOHNSON, TOMPKINS,
BURR & SMITH
2510 14th Street, Suite 910
Gulfport, MS 39501
Email: lcanada@gallowaylawfirm.com
Email: kplatt@gallowaylawfirm.com
*Attorneys for Defendant/Third Party Plaintiff,
D&D Express Transport Corp. & Defendant Adolfo Perez*

Kelly Williams
Aafram Y. Sellers
SELLERS & ASSOCIATES, PLLC
5760 I-55 North, Suite 300
Jackson, MS 39211
Email: afram@sellerslaw.net
Attorneys for Third Party Defendant Daryl D. Williams

/s/ Edward P. Rowan
Edward P. Rowan